

JOHN J. HAYES, JR.

Plaintiff

vs.

HERMAN FISCHER, et.al.

Defendants

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In the Circuit Court for  
Frederick County, MD  
Civil No 3748C

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MOTION FOR POSTING

John J. Hayes, Jr., by and through Robert J. Kresslein, Esquire, STERN & KRESSLEIN, P.A., his attorneys, hereby moves for service by posting in accordance with Rule 2-122A against all Defendants having or claiming to have an interest in that parcel of real estate described in the accompanying complaint, and for grounds states as follows:

1. That the accompanying complaint is an action in rem or quas; in rem to wit an action to foreclose the equity of redemption in real estate.

2. That the Plaintiff herein, by Counsel has conducted a sixty (60) year search of the land records of Frederick County Maryland to ascertain the whereabouts of any person having an interest in the real property which is the subject of this suit. There is no evidence in the title abstract that any person or party has an interest in the subject real estate other than those which have been made a party of this suit.

3. That justice would be best served by the posting of a notice on the bulletin board in the vicinity of the Courthouse door warning any and all potential defendants of their rights with respect to this proceeding.

WHEREFORE, your Plaintiff prays that this Honorable Court

a. Grants the Plaintiff leave to serve all unknown and potential defendants not shown in the sixty (60) year title search by posting notice of this action on the bulletin board in the vicinity of the Court House door; and